

Highly Confidential - Subject to Further Confidentiality Review

1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF OHIO
3 EASTERN DIVISION
4 - - -
5 IN RE: NATIONAL :
PRESCRIPTION : MDL No. 2804
6 OPIATE LITIGATION :
_____ : Case No.
7 : 1:17-MD-2804
THIS DOCUMENT RELATES :
8 TO ALL CASES : Hon. Dan A. Polster

9 - - -
10 Friday, December 21, 2018
11 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER
CONFIDENTIALITY REVIEW

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14 Videotaped deposition of PETER RATYCZ, held at
15 the offices of Cavitch, Familo & Durkin,
16 1300 East Ninth Street, Cleveland, Ohio, commencing at
17 8:59 a.m., on the above date, before Carol A. Kirk,
18 Registered Merit Reporter and Notary Public.

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22 GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
23 deps@golkow.com
24



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1 Q. Okay. Why not?

2 A. Because we do have a procedure --
3 what happened here is that -- this was tied to
4 our VAWD accreditation. And there's some
5 background on that. We thought we needed to
6 have this VAWD accreditation. VAWD stands for
7 Verified Accredited Wholesaler Distributor.

8 And this accreditation is for
9 anybody who's selling, you know, medications.
10 It was a requirement by a payer to have this in
11 place. There was a gray area there in our
12 interpretation. And I'll answer your question.
13 It's just some background there.

14 Q. No, no. Please continue.

15 A. There was a gray area there that
16 we did not -- since we're a distributor to our
17 own stores, whether we needed that. Because
18 we're not distributing to a customer.
19 Essentially our stores, I guess, are our
20 customer.

21 So we didn't think we needed it.
22 It was recommended that we go through this VAWD
23 accreditation process. We got halfway through
24 that process. The payer said, "No, you don't

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1 CERTIFICATE

2 STATE OF OHIO :

SS:

3 COUNTY OF FRANKLIN :

4 I, Carol A. Kirk, a Registered Merit
Reporter and Notary Public in and for the State of
5 Ohio, duly commissioned and qualified, do hereby
certify that the within-named PETER RATYCZ was by me
6 first duly sworn to testify to the truth, the whole
truth, and nothing but the truth in the cause
7 aforesaid; that the deposition then given by him was
by me reduced to stenotype in the presence of said
8 witness; that the foregoing is a true and correct
transcript of the deposition so given by him; that the
9 deposition was taken at the time and place in the
caption specified and was completed without
10 adjournment; and that I am in no way related to or
employed by any attorney or party hereto or
11 financially interested in the action; and I am not,
nor is the court reporting firm with which I am
12 affiliated, under a contract as defined in Civil Rule
28 (D) .

13

IN WITNESS WHEREOF, I have hereunto set my
14 hand and affixed my seal of office at Columbus, Ohio
on this 27th day of December 2018.

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CAROL A. KIRK, RMR

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NOTARY PUBLIC - STATE OF OHIO

20 My Commission Expires: April 9, 2022.

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